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Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRYAN CORNELL,

Plaintiff,

v.

**JOHN BONAVENTURA, individually
and in his official capacity as Las Vegas
Township Constable; et. al.,**

Defendants.

Case No. 2:14-cv-1906-APG-NJK

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE PENDING DISPOSITIVE MOTIONS**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure ("FRCP") 6(b)(1)(A), Plaintiff respectfully requests that the Court extend, to and until April 6, 2015, the time within which Plaintiff must respond to the dispositive motions filed by Defendants Lou Toomin (Pacer #23) and Dean Lauer (Pacer #28). "Captain Rich Forbus" also filed a dispositive motion (Pacer #32)¹ to which Plaintiff is expected to respond on April 6, 2015. Presently, Plaintiff's response to the dispositive motions filed by Defendants Toomin and Lauer are due on March 30, 2015. This is

¹ Forbus is not an actual party to this suit but instead challenges his ability to receive service of process on behalf of Defendant Office of the Las Vegas Township Constable.

1 Plaintiff's first request for an extension of time for the purpose set forth herein.

2 In support of this motion, Plaintiff relies upon the memorandum of points and authorities
3 set forth below.

4 **MEMORANDUM OF POINTS AND AUTHORITIES**

5 FRCP 6(b)(1)(A) permits a party to seek an extension of a deadline prior to its expiration
6 upon a showing of "good cause." Here, "good cause" exists to extend Plaintiff's time to respond
7 to the dispositive motions.

8 Counsel for Plaintiff has been working towards completing responses to the various
9 dispositive motions filed by Defendants Toomin, Lauer and non-party Forbus. However, due to
10 an incredibly busy work schedule coupled with undersigned counsel's recent illness on account
11 of allergies, he has not been able complete the responses to Toomin and Lauer's motions within
12 the current deadline. During the early part of last week, undersigned counsel was busy with a
13 criminal matter in which his client faces potential federal indictment. During the second half of
14 last week, and through the weekend, undersigned counsel was badly affected by allergies which
15 interfered with his ability to attend to various case commitments. An additional one week
16 extension of time, however, should permit undersigned counsel sufficient time to complete
17 responses to the various dispositive motions pending before the Court.

18 Defendants Toomin and Lauer will experience no prejudice should the Court grant this
19 motion. Based upon "good cause," Plaintiff, by and through undersigned counsel, respectfully
20 requests that the Court permit him an additional week to respond to the pending dispositive
21 motions filed by Defendants Toomin and Lauer.

22 . . .

23 . . .

24 . . .

25 . . .

CONCLUSION

Plaintiff, by and through counsel, respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/ Paul S. Padda

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Attorney for Plaintiff

Dated: March 30, 2015

IT IS SO ORDERED:

Plaintiff's request for a one week extension of time to respond to the dispositive motion filed by Defendants Lou Toomin (Pacer #23) and Dean Lauer (Pacer #27) is hereby granted. Plaintiff's responses are due on or before April 6, 2015.



United States District Judge

DATED: April 1, 2015

CERTIFICATE OF SERVICE

In compliance with the Court's Local Rules, the undersigned hereby certifies that on March 30, 2015, a copy of the foregoing document, "PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO THE PENDING DISPOSITIVE MOTIONS" was served (via the Court's CM/ECF system) upon counsel of record for Defendants.

/s/ Paul S. Padda

Paul S. Padda, Esq.